

United States Bankruptcy Court

Western District of Michigan

One Division Ave., NW

Room 200

Grand Rapids, MI 49503

IN RE: Debtor(s) (name(s) used by the debtor(s) in the last 8 years, including married, maiden, trade, and address):

William Richard Bailey

345 Centreville St

Constantine, MI 49042

SSN: xxx-xx-8136

Crystal Jean Bailey

345 Centreville St

Constantine, MI 49042

SSN: xxx-xx-0968

Debtor(s)

Case Number 03-08649-jrh

Chapter 7

Honorable Jeffrey R. Hughes

NOTICE OF HEARING TRUSTEE'S MOTION TO SELL PROPERTY

The above motion has been filed with the Bankruptcy Court. Your rights may be affected. **You should read these papers carefully and discuss them with your attorney. (If you do not have an attorney, you may wish to consult one.)**

If you want the court to consider your views on this matter, attend the hearing scheduled to be held before the Hon. Jeffrey R. Hughes on September 28 , 2006 at 1:00 pm at Room 114, US Courthouse and Federal Bldg., 410 W. Michigan Ave. Kalamazoo, MI

You or your attorney may wish to file a response explaining your position. Such response should be received at least three business days prior to the scheduled hearing. A copy should also be served upon the party who has filed the motion to his/her attorney. **Please refer to Administrative Order 2004-06 (Mandatory Electronic Filing), effective January 1, 2005, for practices and procedures for filing pleadings with the Court.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

PLEASE NOTE: NOTICE IS HEREBY GIVEN that the court may, in its discretion, orally continue or adjourn the above hearing on the record in open court. If this occurs, parties in interest will not be given further written notice of the continued or adjourned hearing. If an entity is not present at the originally scheduled hearing, information regarding the time, date and place of an orally continued or adjourned hearing may be obtained at the Clerk's office from the court files or docket.

This Notice has been returned to Dwight K. Hamilton . It is Dwight K. Hamilton (s/'s) responsibility to ensure that service of this Notice and the referenced Motion is made upon the appropriate parties not less than twenty (20) days prior to the date of hearing. (sc)



DANIEL M. LAVILLE
CLERK OF BANKRUPTCY COURT

Dated: August 16, 2006

/S/ _____
Kim Davis
Deputy Clerk

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

IN RE:
WILLIAM BAILEY and
CRYSTAL BAILEY,
Debtors.

Case No. 03-08649-jcs
Chapter 7
Hon. Jo Ann C. Stevenson
United States Bankruptcy Judge

TRUSTEE'S MOTION TO SELL PROPERTY

John T. Piggins, Chapter 7 Trustee herein, by and through his attorneys, Miller Johnson, and as his Motion to Sell Property, states as follows:

1. This case was commenced by the filing of a Voluntary Petition under Chapter 7 of the United States Bankruptcy Code on or about July 11, 2003 (the "Petition Date").

2. Included among the assets in the Debtors' estate is Debtors' book of business as an insurance agent for G.E. Capital (the "Property").

3. This Property generates residual commissions paid on policies that were originally sold pre-petition.

4. Consequently, this Property and the commissions it generates are property of the estate under 11 U.S.C. §541.

5. Otis Hutchinson has offered to purchase the Property for the sum of \$8,000.00 payable as soon as practicable after the sale has been approved by this Court.

6. The Trustee believes that the sale of the Property to purchase is in the best interests of the creditors in this estate for the following reasons:

a. The value of this asset will decrease over time and the bankruptcy estate will recover more if it sells the Property at this time; and

b. Upon investigation, the Trustee believes the proposed purchase price is fair and reasonable.

WHEREFORE, John T. Piggins, Trustee respectfully requests that this Court enter an Order:

- a. Approving the sale on the terms described above; and/or
- b. Granting such other and further relief as this Court deems just.

MILLER JOHNSON
Attorneys for Trustee, John T. Piggins

Dated: August 15, 2006

By /s/ Dwight K. Hamilton
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